

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

<b>UNITED STATES OF AMERICA</b>	)	Criminal No.	5:18-CR-9 (FJS)
	)		
<b>v.</b>	)	<b>First Superseding Indictment</b>	
	)		
<b>SHAQUILLE BRELAND (aka</b>	)	Violations:	18 U.S.C. § 1513(a)(1)(B)
<b>“SHAQ”),</b>	)		[Obstructing Justice by
	)		Retaliation]
	)		18 U.S.C. § 1513(f)
	)		[Conspiracy to Retaliate]; and
	)		18 U.S.C. § 924(c)(1)(A)
	)		[Using Firearm During and In
	)		Relation to a Crime of
	)		Violence]
	)	3 Counts	
	)		
<b>Defendant.</b>	)	County of Offense:	Onondaga

**THE GRAND JURY CHARGES:**

**COUNT 1**  
**[Obstructing Justice By Retaliation]**

On or about December 9, 2017, in the Northern District of New York, the defendant, **SHAQUILLE BRELAND (aka “SHAQ”)**, did attempt to kill a person with the intent to retaliate against that person for providing to a law enforcement officer information relating to the commission of a Federal offense, in violation of Title 18, United States Code, Section 1513(a)(1)(B).

**COUNT 2**  
**[Conspiracy to Retaliate]**

On or about December 9, 2017, in the Northern District of New York, the defendant, **SHAQUILLE BRELAND (aka “SHAQ”)** conspired with Georvan Harris (aka “Boomer”) to threaten to cause bodily harm and damage the tangible property of a person with the intent to

retaliate against a person for information relating to the commission of a federal offense given by a person to a law enforcement officer, in violation of Title 18, United States Code, Section 1513(b)(2).

In furtherance of the conspiracy, the defendant **SHAQUILLE BRELAND (aka "SHAQ")** and co-conspirator **GEORVAN HARRIS (aka "BOOMER")** took the following overt acts:

1. **SHAQUILLE BRELAND (aka "SHAQ")** chased a sedan on foot;
2. **SHAQUILLE BRELAND (aka "SHAQ")** and **GEORVAN HARRIS (aka "BOOMER")** chased that sedan in a sport utility vehicle driven by **GEORVAN HARRIS (aka "BOOMER")** with **SHAQUILLE BRELAND (aka "SHAQ")** as a passenger and fired shots at the sedan using a 9 mm pistol.

All in violation of Title 18, United States Code, Section 1513(f).

### **COUNT 3**

#### **[Using and Carrying Firearm During and In Relation to a Crime of Violence]**

On or about December 9, 2017 in the Northern District of New York, the defendant, **SHAQUILLE BRELAND (aka "SHAQ")**, during and in relation to a crime of violence, for which he may be prosecuted in a court of the United States, that is Obstructing Justice By Retaliation, in violation of Title 18, United States Code, Section 1513(a)(1)(B), knowingly used and carried a firearm, that is, a 9 millimeter pistol, in violation of Title 18, United States Code, Section 924(c)(1)(A). That firearm was discharged, in violation of Title 18, United States Code,

Section 924(c)(1)(A)(iii).


Dated: October 18, 2018

A TRUE BILL, \*\*NAME REDACTED

  
Grand Jury Foreperson

GRANT C. JAQUITH  
United States Attorney

By:

  
Nicolas Commandeur  
Assistant United States Attorney  
Bar Roll No. 518984